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7 Attorneys for Plaintiff

8 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
9 **IN AND FOR THE COUNTY OF MARICOPA**
10

11 STATE OF ARIZONA,

12 Plaintiff

13 vs.

14 EDWARD ANTHONY PURVIS
15 (001),

16 Defendant.
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No. CR - _____

64 S.G.J. 16

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEME
AND ARTIFICE, A.R.S. §13-2310,**
a Class 2 Felony

**COUNTS 2, 3, 6, 8, 10, 11, 12, 13, 14, 15, 17,
18, 19, 20, 21, 22: THEFT, A.R.S. §13-**
1802(A)(1)(2)(3), Class 2 Felonies

COUNTS 4, 7, 9, 16: THEFT, A.R.S. §13-
1802(A)(1)(2)(3), Class 3 Felonies

COUNT 5: THEFT, A.R.S. §13-
1802(A)(1)(2)(3), A Class 4 Felony

COUNTS 23-43: SECURITIES FRAUD,
A.R.S. § 44-1991, Class 4 Felonies

**COUNTS 44-64: SALE OF
UNREGISTERED SECURITIES, A.R.S. §
44-1841, Class 4 Felonies**

**COUNTS 65-85: TRANSACTIONS BY
UNREGISTERED DEALERS OR
SALESMEN, A.R.S. § 44-1842, Class 4
Felonies**

**COUNT 86: ILLEGAL CONTROL OF
AN ENTERPRISE, A.R.S. §13-2312,
A Class 3 Felony**

The Arizona State Grand Jury accuses EDWARD ANTHONY PURVIS, charging on
this 14th day of January, 2009, that:

COUNT 1

(FRAUDULENT SCHEMES AND ARTIFICES)

Between about February 19, 2002 and March 31, 2007, pursuant to a scheme or
artifice to defraud, Defendant EDWARD ANTHONY PURVIS knowingly obtained a
benefit by means of false or fraudulent pretenses, representations, promises or material
omissions, and the benefit so obtained involved property with a value of \$100,000 or more,
in violation of A.R.S. §§ 13-2310, 13-301, 13-302, 13-303, 13-304, 13-306, 13-701, 13-702,
13-702.01 and 13-801.

Said conduct occurred when Defendant EDWARD ANTHONY PURVIS knowingly
obtained in excess of \$8,000,000 from investors, including those investors identified in
Counts 2-22 of this Indictment, in an entity called NAKAMI CHI GROUP MINISTRIES
INTERNATIONAL or N.C.G.M.I by means of fraudulent pretenses, representations,
promises or material omissions including but not limited to the following:

1 1. PURVIS told investors in N.C.G.M.I. that investor funds placed in N.C.G.M.I. would
2 be loaned to other companies at high rates of return which would provide a
3 guaranteed return to investors of 2% or more per month.

4 2. PURVIS made claims of great personal wealth and stated he would personally
5 guarantee the investment returns promised to investors.

6 3. PURVIS told some investors that by forming a "corporation sole" they would not
7 have to pay taxes on the investment return paid by N.C.G.M.I. each month or that
8 payments made by N.C.G.M.I. were "gifts" and therefore were not taxable.

9 4. PURVIS told some investors that their investments in N.C.G.M.I. were secured by
10 specific corporate guarantees, ~~gold bouillon, magnesium or other minerals.~~ *withheld not*

11 Defendant PURVIS also obtained these funds by failing to disclose to investors
12 certain material facts, including the following:

13 1. That N.C.G.M.I. never generated a profit for itself or its investors.

14 2. That N.C.G.M.I. was only able to continue operating by continuing to raise funds
15 from investors.

16 3. That N.C.G.M.I. used investor funds to repay other N.C.G.M.I. investors and not to
17 make loans to companies as represented.

18 4. That N.C.G.M.I. investor funds were used for the personal benefit of Defendant
19 PURVIS and others.

20 COUNTS 2-22

21 (THEFT)

22 On or about the dates stated below, Defendant EDWARD ANTHONY PURVIS,
23 knowingly and without lawful authority: (1) controlled property of another with intent to
24 deprive them of such property; or (2) converted for an unauthorized term or use property of
25 another entrusted to the defendant or placed in the defendant's possession for a limited,
26 authorized term or use; or (3) obtained property of another by means of a material

misrepresentation with intent to deprive them of such property, in violation of A.R.S §§ 13-1801, 13-1802(A)(1)(2)(3), 13-301, 13-302, 13-303, 13-304, 13-306, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when Defendant obtained by the means alleged in Count 1 the following amounts of money from the following persons for investments in NAKAMI CHI GROUP MINISTRIES INTERNATIONAL or N.C.G.M.I., and when he then controlled those funds for his own purposes and for unauthorized uses:

<u>Count</u>	<u>Date(s)</u>	<u>Investor Name</u>	<u>Amount</u>
2	9/15/04	Larry McPike	\$60,000.00
3	10/7/05	Larry McPike	\$28,500.00
4	3/23/04	Jo Ann Brundage-Davis	\$8,200.00
5	5/2/05	Jo Ann Brundage-Davis	\$3,000.00
6	2/4/03	Linda Heninger	\$50,000.00
7	7/22/03	Linda Heninger	\$18,000.00
8	5/25/05	Linda Heninger	\$30,000.00
9	9/4/05	John & Rouzanna Burton	\$17,000.00
10	2/27/06	John & Rouzanna Burton	\$46,000.00
11	3/28/06	Robert R. Detwiler	\$104,000.00
12	8/1/06	Robert R. Detwiler	\$188,000.00
13	8/15/06	Robert R. Detwiler	\$100,000.00
14	7/25/04	Mark & Sharon Drown	\$45,000.00
15	8/12/03-8/27/03	Michael & Debra Boler	\$75,000.00
16	12/29/04	Michael & Debra Boler	\$20,000.00
17	3/1/06	Michael & Debra Boler	\$200,000.00
18	5/24/06-5/26/06	Michael & Debra Boler	\$110,000.00

19	4/11/03	Ralph & Janet Holt	\$28,253.33
20	12/7/04	Ralph & Janet Holt	\$161,206.84
21	4/23/04	Patricia M. Adolphe	\$37,085.00
22	4/23/04	Anita Boler	\$27,117.00

COUNTS 23-43
(SECURITIES FRAUD)

On or about the dates specified in Counts 2-22 of this Indictment, Defendant EDWARD ANTHONY PURVIS, in connection with a transaction or transactions within or from Arizona involving an offer to sell or sale of securities to investors specified in Counts 2-22, directly or indirectly employed a device, scheme or artifice to defraud or made untrue statements of material fact or omitted to state material facts necessary, in light of the circumstances under which they were made, not misleading, in violation of A.R.S. §§ 44-1991, 44-1995, 44-1801, 13-301, 13-302, 13-303, 13-304, 13-306, 13-701, 13-702, 13-702.01 and 13-801.

This conduct occurred in connection with the conduct alleged in Count 1.

COUNTS 44-64
(SALE OF UNREGISTERED SECURITIES)

On or about the dates specified in Counts 2-22 of this Indictment, Defendant EDWARD ANTHONY PURVIS sold or offered for sale within or from Arizona securities to investors specified in Counts 2-22 that were required to be registered with the Arizona Corporation Commission and were not so registered, in violation of A.R.S. §§ 44-1841, 44-1801, 13-301, 13-302, 13-303, 13-304, 13-306, 13-701, 13-702, 13-702.01 and 13-801.

This conduct occurred in connection with the conduct alleged in Count 1.

COUNTS 65-85
(TRANSACTIONS BY UNREGISTERED DEALERS OR SALESMEN)

1 On or about the dates specified in Counts 2-22 of this Indictment, Defendant
2 EDWARD ANTHONY PURVIS sold, offered to sell, or offered for sale securities to
3 investors specified in Counts 2-22 and he was not registered with the Arizona Corporation
4 Commission as a securities dealer or salesman, in violation of A.R.S. §§ 44-1842, 44-1801,
5 13-301, 13-302, 13-303, 13-304, 13-306, 13-701, 13-702, 13-702.01 and 13-801 .

6 This conduct occurred in connection with the conduct alleged in Count 1.

7
8 **COUNT 86**
9 **(ILLEGAL CONTROL OF AN ENTERPRISE)**

10 Between about February 19, 2002 and March 31, 2007, Defendant EDWARD
11 ANTHONY PURVIS was associated with an enterprise and conducted its affairs through
12 racketeering, or participated directly or indirectly in the conduct of an enterprise that he
13 knew was being conducted through racketeering, in violation of A.R.S. §§ 13-2312, 13-
14 2301, 13-301, 13-302, 13-303, and 13-304, 13-306, 13-701, 13-702, 13-702.01 and 13-801.

15 Said conduct occurred when Defendant EDWARD ANTHONY PURVIS knowingly
16 and illegally conducted and/or controlled an entity called NAKAMI CHI GROUP
17 MINISTRIES INTERNATIONAL or N.C.G.M.I. through the racketeering conduct alleged
18 in Counts 1-64.

19 Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described
20 above were committed in or from Maricopa County, Arizona.

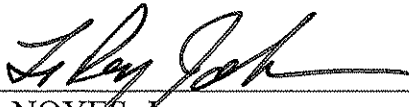
21
22 A True Bill

(A "True Bill")

23 with amendment to strike
24 out "gold bouillon, magnesium or
25 other minerals" from page 3
26 item 4.

1 TERRY GODDARD
2 ATTORNEY GENERAL
3 STATE OF ARIZONA

DATED: 1-24-2009

4 
5 E. G. NOYES, Jr.
6 LeROY JOHNSON
7 Assistant Attorneys General


Foreperson of the State Grand Jury

#307234v4